



4008 Gibsonia Road, Gibsonia, PA 15044 | 724.449.SAVE | [www.nptc.com](http://www.nptc.com)

Kevin J. Albaugh  
Vice President-Regulatory Affairs  
(724) 443-9598

February 7, 2006

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**IN RE: WC Docket No. 05-196  
Subscriber Acknowledgement Report  
Due November 28, 2005**

Dear Secretary Dortch:

This Subscriber Acknowledgement Report is filed by North Pittsburgh Telephone Company ("NPTC") in accordance with the requirements set forth in the Federal Communications Commission's ("Commission") VoIP 911 Order at WC Docket No. 05-196 adopted May 19, 2005 and released June 3, 2005 and as updated by the Commission through additional guidance provided by the Enforcement Bureau in the form of Public Notices.

The deadline for filing this Subscriber Acknowledgement Report was November 28, 2005. However, NPTC inadvertently missed the deadline for filing this report as NPTC only recently began offering its VoIP service to customers and was unaware of the Public Notice released by the Commission's Enforcement Bureau at DA 05-2874 on October 31, 2005.

NPTC respectfully requests that the Commission grant NPTC a limited extension of time in which to file and hereby accept this late-filed Subscriber Acknowledgement Report.

NPTC began providing VoIP service to customers as an interconnected VoIP service provider on September 14, 2005.

#### SUBSCRIBER ACKNOWLEDGEMENT STATUS REPORT

As required by the Commission's VoIP 911 Order, NPTC advises every subscriber prominently and in plain language of the circumstances under which E911 Service may not be available or may in some way be limited by comparison to traditional E911 Service. NPTC provides this 911 limitations notice to the customer through the inclusion of the notice with the Customer Premises Equipment (CPE) that is mailed to the customer. This notice also includes additional warning stickers, which can be placed on the CPE that is used with the VoIP service. In the mailing, NPTC instructs the customer to place the stickers on or near the CPE that will be

used with the interconnected VoIP service. The 911 limitations notice information is also included prominently in the opening paragraphs of the General Terms and Conditions of the VoIP service, a copy of which is also mailed to the customer along with the CPE. The General Terms and Conditions document, which contains the 911 limitations notice, is also listed on the NPTC website in the section dealing with VoIP services. ([www.connecttime.net/broadbandphone\\_terms.asp](http://www.connecttime.net/broadbandphone_terms.asp)) NPTC also provides the 911 limitations notice information in the Frequently Asked Questions (FAQs) section of the NPTC website, which deals with VoIP service. ([www.connecttime.net/broadbandphone\\_generalfaq.asp#26](http://www.connecttime.net/broadbandphone_generalfaq.asp#26)) As required by the Commission's VoIP 911 order, NPTC also attempts to obtain and keep a record of affirmative acknowledgement by every subscriber using the VoIP service that they have received the 911 limitations notice. NPTC begins the 911 limitations affirmative acknowledgement process by mailing an affirmative acknowledgement form to the customer along with the CPE. As stated above, this mailing contains not only the 911 limitations notice information but also the General Terms and Conditions document, which also includes the 911 limitations information. NPTC requests that the customer sign and return the acknowledgement form to NPTC. If, after 15 days, NPTC has not received the signed acknowledgement form from the customer, NPTC then sends a second letter containing copies of the 911 limitations notices that were sent previously, including another acknowledgement form along with a request that the customer sign and return this acknowledgement form. If after another 15 days (or day 30 from the day that the first notice was sent), NPTC still has not received the signed acknowledgement form from the customer, NPTC calls the customer to explain the 911 limitations and to request an oral acknowledgement. If by day 45 after the initial request was sent, NPTC still has not received the signed acknowledgement form nor been able to contact the customer by telephone for an oral acknowledgement, no further action is taken, and NPTC's records are marked to indicate that the customer has not responded to the multiple requests to return the signed acknowledgement form nor has provided an oral acknowledgement.

As of November 28, 2005, NPTC had received affirmative acknowledgements from 36% of its customer base. However, due to the continued implementation of the notification efforts listed above, as of February 7, 2006 NPTC has now received affirmative acknowledgements from 94% of its customer base.

The Commission also asked interconnected VoIP providers to explain why they have been unable to achieve an acknowledgement ratio closer to 100%. NPTC believes that it has been unable to achieve an acknowledgement ratio closer to 100% of its subscribers for two reasons. First, in that NPTC is adding customers almost daily to the new service and it is in its beginning phase of deployment, there is a delay between the time a new customer signs up for the service and the time it takes for them to provide acknowledgement. Because of the time lag during this initial deployment, it is unlikely that NPTC will be able to achieve 100% acknowledgement at any given time. The second reason for not achieving an acknowledgement ratio closer to 100% may be due to the fact that some customers tend to ignore and do not read any documentation concerning services they purchase when they believe they already know how the service operates. Because customers today are inundated with lengthy documents from a variety of companies including banks, insurance companies, credit card companies and utilities, these customers have decided they do not need to concern themselves with those documents until such time as a problem may arise. Some customers do not read General Terms and Conditions language nor do they read warning labels or owner's

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manuals or user instructions. Some customers in fact throw these documents away immediately upon receiving them without ever reading them. While NPTC would prefer that its customers read the information that it provides, some customers would rather use a service to discover how it operates and its limitations.

In summary, NPTC believes it is in full compliance with the Commission's rules regarding 911 limitations notification and affirmative acknowledgement for its interconnected VoIP service. In addition, NPTC will continue implementing the notification and acknowledgement program outlined above in order to achieve as high an acknowledgement ratio as is possible under the circumstances and in order to provide its customers with E911 services as required by the Commission. NPTC respectfully requests that the Commission grant NPTC a limited extension of time in which to file and hereby accept this late-filed Subscriber Acknowledgement Report.

Respectfully submitted,



Kevin J. Albaugh  
Vice President-Regulatory Affairs

KJA/vb/kmg

cc Byron McCoy  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission

Kathy Berthot  
Deputy Chief  
Spectrum Enforcement Division  
Enforcement Bureau  
Federal Communications Commission

Janice Myles  
Competitive Policy Division  
Wireline Competition Bureau  
Federal Communications Commission

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